

## II. Specific claim language

### Claim 23

None of the elements recited in the body of Applicant's Claim 23 after the phrase "*improvement comprises*" is disclosed or suggested by Driessen.

1. Applicant's Claim 23 recites that the "*area*" associated with each parcel is divided into a plurality of "*sub-areas*." The final Office Action stated that Driessen showed this limitation at column 5, lines 15-33.

The passage referred to in the final Office Action does not refer to the dividing of the area associated with a parcel into sub-areas. Instead, the passage referred to in the Office Action refers to dividing an area into sub-areas (referred to by Driessen as "blocks") which are then used to form parcels. Driessen does not disclose or suggest that the areas used to form parcels are then further divided into "*sub-areas*", as recited in Applicant's independent Claim 23.

2. Applicant's Claim 23 recites that a "*first index*" is stored that "*identifies*" the "*sub-areas*" (into which the area associated with the parcel is divided) that are "*intersected*" by each of the "*data entities*" contained in the "*parcel*."

The final Office Action stated that Driessen shows this limitation at column 8, lines 13-44. This passage from Driessen does not refer to a "*first index*" of the type recited in Applicant's Claim 23. In this passage from Driessen, Driessen describes (1) a main cell table and (2) a base cell table. The main cell table disclosed by Driessen associates an identifier (that represents the division pattern of the main cells) with a pointer to a base cell table, which in turn points to a parcel list that is used to identify the location in memory of each parcel which forms part of the main cell. (See, Driessen: column 8, line 65-column 9, line 5). Thus, the indexes disclosed by Driessen are used to locate parcels, given geographic locations. The "*first index*" recited in Applicant's Claim 23 is different in at least three ways.

(1) First, the "*first index*" of Applicant's Claim 23 works oppositely from the index (i.e., the main cell table and the base cell table) disclosed in Driessen. The "*first index*" in Applicant's Claim 23 finds the "*sub-areas*" intersected by a geographic feature represented by a "*data entity*", given the "*data entity*." As stated above, Driessen finds the "*parcel*", given a location.

(2) Another difference between the index recited in Applicant's Claim 23 and the index of Driessen is that Applicant's index associates multiple sub-areas with each data entity contained within a parcel (if the geographic feature represented by the data entity intersects multiple sub-areas) whereas the Driessen index associates a single parcel with a location.

(3) A third difference is that the index of Applicant's Claim 23 pertains to data entities within a parcel. The index of Driessen relates to finding entire parcels and does not pertain to data entities contained within any of the parcels.

At least for any of the above reasons, Applicant's Claim 23 is not obvious over the Driessen patent.

#### Claim 24

Applicant's independent Claim 24 recites

a "*first index*" associated with a parcel that identifies which of a "*plurality of rectangular sub-areas*" into which a "*first rectangular area*" associated with the "*parcel*" is divided intersect a "*search area*" and  
"*a second index*" associated with the parcel that identifies the "*data entities*" contained in the parcel that "*intersect each of the plurality of rectangular sub-areas identified as intersecting the search area.*"

In the final Office Action, it was acknowledged that Driessen did not disclose these indexes, however, it was stated that it would have been obvious to provide them because it would have speeded up retrieval of data by creating an "alphabetized list."

Applicant submits that this rejection should be withdrawn because the claim does not call for creation of an "alphabetized list", nor would such a list be appropriate in a spatially organized parcel of the type disclosed here. Moreover, Driessen includes no disclosure that relates to how data within any parcels are organized or accessed. Accordingly, at least for these reasons, Applicant's Claim 24 is not obvious over Driessen.

#### Claim 25

Applicant's independent Claim 25 recites a "*second index*" that identifies each of the "*data entities*" contained in a parcel that represents a geographic feature that intersects each of the "*sub-areas*" "*formed of the rectangular area associated with the parcel.*" In the final Office Action, it was stated that Driessen showed the "*second index*" at column 8, lines 18-30. As explained above in connection with Applicant's Claim 23, Driessen includes no disclosure or teaching that suggests the further division of the area associated with a parcel. Accordingly, Applicant's Claim 25 is not obvious over Driessen at least for this reason.

#### Claim 27

Applicant's independent Claim 27 recites an "*index*" that relates each of the "*data entities*" contained in a parcel to "*at least one rectangular sub-area formed of the rectangular area associated with the parcel.*" The final Office Action stated that Driessen showed this limitation at column 5, lines 31-33; column 1, lines 40-45; column 2, lines 44-68; and column 4, lines 1-10. As explained above in connection with Applicant's Claim 23, Driessen does not disclose or suggest that the areas associated with parcel are further divided into "*sub-areas.*" Accordingly, at least for this reason, Applicant's Claim 27 is not obvious over Driessen.

#### Claim 29

Applicant's independent Claim 29 recites a "*second index*" that associates each of the "*data records*" in a parcel to at least one of a "*plurality of sub-areas . . . associated with the parcel.*"

In the final Office Action, it was acknowledged that Driessen did not disclose the "*second index*" recited in Applicant's Claim 29, but that it would have been obvious to provide this index because indexes are well known for speeding up retrieval of data. The position taken in the final Office Action should be withdrawn because it does not take into account the types of data (i.e., the "*data records*" and the "*plurality of sub-areas . . . associated with the parcel*") that are being associated with each other in the "*second index*" recited in Applicant's Claim 29. As explained above in connection with